

To: Gray, David[gray.david@epa.gov]; Coleman, Sam[Coleman.Sam@epa.gov]
Cc: Hansen, Mark[Hansen.Mark@epa.gov]; Williams, Odessa[Williams.Odessa@epa.gov];
Blanco, Arturo[Blanco.Arturo@epa.gov]; Blevins, John[Blevins.John@epa.gov]; Seager,
Cheryl[Seager.Cheryl@epa.gov]; Edlund, Carl[Edlund.Carl@epa.gov]; Garcia,
David[Garcia.David@epa.gov]; Gilrein, Stephen[gilrein.stephen@epa.gov]; Harrison,
Ben[Harrison.Ben@epa.gov]; Hill, Troy[Hill.Troy@epa.gov]; Honker, William[honker.william@epa.gov];
McDonald, James[McDonald.James@epa.gov]; Phillips, Pam[phillips.pam@epa.gov]; Smith,
Rhonda[smith.rhonda@epa.gov]; Taheri, Diane[Taheri.Diane@epa.gov]
From: Stenger, Wren
Sent: Fri 12/11/2015 6:31:28 PM
Subject: Chloroprene DuPont NATA LDEQ/LDHH brief

David, for the call with LDEQ and LDHH on Monday, Dec 14 at 10 AM, my suggestion for those to be included on the invitation include:

Mike Koerber

Steve Page

Peter Tsirigotis

Penny Lassiter

Kelly Rhimer

Erika Sasser

Others from HQs? Millet, Jenny Noonan, Debbie Jordan, others???

George Pettigrew, Jennifer Lyke

Others from ATSDR or CDC?

Ron Curry, Sam Coleman, David Gray

Wren Stenger, Mark Hansen, Fran Verhalen, Ruben Casso

John Blevins, Steve Gilrein, Steve Thompson, Jeff Yurk

James McDonald, Troy Hill, Wes McQuiddy, Marvelyn Humphrey

Carl Edlund, Ronnie Crossland, Nick Fressia

Ben Harrison, Cheryl Seager

Arturo Blanco, Rhonda Smith, Israel Anderson

Others from R6?

LDEQ and LDHH will provide their names to you directly.

Wren Stenger

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

From: Gray, David

Sent: Friday, December 11, 2015 11:56 AM

To: Tegan Treadaway; Stenger, Wren; Coleman, Sam; Noonan, Jenny

Subject: Re: NATA LDEQ/LDHH brief

We have the briefing set up for Monday at 10 am CT. We will need a list of attendees in advance of the meeting so they can access the webinar presentation.

Please send names to me and Jenny Noonan.

Below are details.

For this meeting with the Departments of Environment and Health for the State of Louisiana, we will be using the call in number:

Ex. 6 - Personal Privacy

To view the webinar, <http://epawebconferencing.acms.com/natapreview/>

This has been set up such that only “approved guests” can enter; everyone will need to sign in and be approved by the OAPQS moderators (Kelly and me) before they can enter the meeting.

We can approve in the moments before the meeting starts. Everyone should sign in with his/her full names so that we don’t have to guess who’s trying to enter.

Sent from my iPhone

On Dec 10, 2015, at 4:16 PM, Tegan Treadaway <Tegan.Treadaway@LA.GOV> wrote:

If not/ please let us know what works. DHH is not available in the pm.

Sent from my iPhone

To: Pettigrew, George[pettigrew.george@epa.gov]
Cc: Dianne Dugas[Dianne.Dugas@LA.GOV]; Luann E White[lawhite@tulane.edu]
From: Raoult Ratard
Sent: Tue 12/8/2015 3:57:53 PM
Subject: RE: Cancer

I understand that but it make no difference. The fact remains that EPA/ATSDR made us lose 3 staffs in a section that was already short staffed. The only way for the “EPA/ATSDR” to understand that their actions has consequences is to repeat over and over again that their decision do have consequences. I am very sorry that you feel “targeted” but the message is very important.

The other disturbing trend is when I hear or see the word “health study”. It seems that particularly EPA is alluding to “health studies”. I am not sure the reasons behind this trend. There may be several explanations:

- 1-Study mongers do not have a clue about the cost, the lack of conclusion, the disappointment following the hope created, the distrust created by the broken promises of a solution. Study mongers drank the cool aid.
- 2-Study mongers relish the fuzzy feeling of offering a solution to people who often have a valid concern. The fumes of the snake oil are addictive.
- 3-Study mongers are fascinated by the opportunities created for them, their research, their glory or their pocket book.

If by chance EPA or ATSDR want to do a “health study” about the motivations of the “study mongers” I am willing to participate for free on my own time and dime.

From: Pettigrew, George [mailto:pettigrew.george@epa.gov]
Sent: Monday, December 07, 2015 6:06 PM
To: Raoult Ratard
Subject: Re: Cancer

I know it doesn't help but the regional office was not apart of the review/decision process. We were only informed several days before the state was notified. We along with some in Atlanta tried to see if something could be done; like the be five years. Just wanted to let you know some of us were own your side.

George

Sent from my iPhone

On Dec 7, 2015, at 5:06 PM, Raoult Ratard <Raoult.Ratard@LA.GOV> wrote:

OK thanks. We are still reeling from having the coag cut out and getting involved into activities that we cannot carry out properly ofr lack of staff. If I misunderstood fine. The “resistance” to unrealistic expectations still will persist.

From: Pettigrew, George [<mailto:pettigrew.george@epa.gov>]
Sent: Monday, December 07, 2015 1:17 PM
To: Raoult Ratard; Dianne Dugas
Subject: RE: Cancer

I would be pleased to discuss with Dr. Ratard his concerns. It appears there might be some misunderstanding of my previous call with Dianne. I had been informed by EPA about the planned release of the DuPont/Laplace report and wanted the State to be aware of the content as well as share additional information as received so they would not be caught unaware. Nothing was requested for any involvement on their part. Dianne was kind enough to share several documents she had.

George

From: Raoult Ratard [<mailto:Raoult.Ratard@LA.GOV>]
Sent: Friday, December 04, 2015 4:51 PM
To: Dianne Dugas; Kathleen Aubin; Shannon Soileau; Andrews, Patricia (PAndre@lsuhsc.edu); Luann E White
Cc: Pettigrew, George
Subject: RE: Cancer

Not only ATSDR cut our funding BUT they have the nerve to dump on us all these requests. Once upon a time ATSDR had a cooperative agreement with LDHH. After they discontinue the coag we had to let go of some positions. We are not magicians.

SO THERE IS NO COMMITMENT FROM LDHH to provide expected support for issues that are forwarded from EPA or ATSDR. SEET priority will remain to address issues brought up from the state. The saying goes "One does what one can with what one has". If EPA /ATSDR are unhappy with the level of support the state can muster, think about setting up a new coag.

In this specific case EPA release the TRI data and ATSDR has the nerve, after defunding SEET to expect SEET to deal with the aftermath!!! Health studies are extremely unproductive, extremely expensive so THERE IS NO WAY that SEET can get involved in health studies.

DIANNE: EVERY PHONE CALL FROM EPA /ATSDR NEEDS TO BE CLEARLY DOCUMENTED SO WE KEEP TRACT OF THEIR REQUESTS. WE NEED TO START DOCUMENTING THEIR UNREALISTIC EXPECTATIONS. IF WE DO NOT DO THAT, WE ARE GOING LOOK LIKE OBSTRUCTIONISTS. Perhaps a call involving George and me would be useful.

From: Dianne Dugas

Sent: Friday, December 04, 2015 12:11 PM

To: Raoult Ratard; Kathleen Aubin; Shannon Soileau; Andrews, Patricia (PAandre@lsuhsc.edu); Luann E White

Subject: FW: Cancer

Just to bring you up to date – got calls in the last couple of days from LDEQ and ATSDR to let us know that an EPA TRI risk assessment and modeling results are soon to be released – LDEQ has requested that LDHH participate in a conference call with them next week (there was some indication that LDEQ planned to refer public inquiries about the health implications of the EPA results to LDHH to address) and ATSDR requested that we work with their agency to support the Regional EPA after the release of the National EPA results. Possible requests for health studies and environmental justice issues were mentioned by George so I forwarded him recent health documents related to the subject – haven't heard back from LDEQ yet with a conference call schedule. George sent me information on a chemical of concern and mentioned that cancer was of particular concern in St John the Baptist parish as it relates to the permitted release of chloroprene in the area from a DuPont facility. This is preliminary information and may change in the future. Thanks.

From: Dianne Dugas
Sent: Friday, December 04, 2015 11:06 AM
To: Pettigrew, George (pettigrew.george@epa.gov)
Cc: Raoult Ratard; Kathleen Aubin; Shannon Soileau; Andrews, Patricia (PAndre@lsuhsc.edu);
Luann E White
Subject: FW: Cancer

George, attached are documents related to Louisiana TRI, the "Cancer Corridor" and a recent ESJE public health investigation. I hope this information is helpful in relation to results of the current EPA National Air Toxics Assessment. Please let me know if you have any other questions or concerns. Thanks. Dianne

To: Rick Gillig[rig4@cdc.gov]
From: Pettigrew, George
Sent: Fri 12/4/2015 11:26:58 PM
Subject: Fwd: Cancer

See below.

Sent from my iPhone

Begin forwarded message:

From: Raoult Ratard <Raoult.Ratard@LA.GOV>
Date: December 4, 2015 at 4:50:57 PM CST
To: Dianne Dugas <Dianne.Dugas@LA.GOV>, Kathleen Aubin <Kathleen.Aubin@LA.GOV>, Shannon Soileau <Shannon.Soileau@LA.GOV>, "Andrews, Patricia (PAndre@lsuhsc.edu)" <PAndre@lsuhsc.edu>, "Luann E White" <lwhite@tulane.edu>
Cc: "Pettigrew, George (Pettigrew.george@epamail.epa.gov)" <Pettigrew.george@epamail.epa.gov>
Subject: RE: Cancer

Not only ATSDR cut our funding BUT they have the nerve to dump on us all these requests. Once upon a time ATSDR had a cooperative agreement with LDHH. After they discontinue the coag we had to let go of some positions. We are not magicians.

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DOCUMENTING THEIR UNREALISTIC EXPECTATIONS. IF WE DO NOT DO THAT, WE ARE GOING LOOK LIKE OBSTRUCTIONISTS. Perhaps a call involving George and me would be useful.

From: Dianne Dugas

Sent: Friday, December 04, 2015 12:11 PM

To: Raoult Ratard; Kathleen Aubin; Shannon Soileau; Andrews, Patricia (PAndre@lsuhsc.edu); Luann E White

Subject: FW: Cancer

Just to bring you up to date – got calls in the last couple of days from LDEQ and ATSDR to let us know that an EPA TRI risk assessment and modeling results are soon to be released – LDEQ has requested that LDHH participate in a conference call with them next week (there was some indication that LDEQ planned to refer public inquiries about the health implications of the EPA results to LDHH to address) and ATSDR requested that we work with their agency to support the Regional EPA after the release of the National EPA results. Possible requests for health studies and environmental justice issues were mentioned by George so I forwarded him recent health documents related to the subject – haven't heard back from LDEQ yet with a conference call schedule. George sent me information on a chemical of concern and mentioned that cancer was of particular concern in St John the Baptist parish as it relates to the permitted release of chloroprene in the area from a DuPont facility. This is preliminary information and may change in the future. Thanks.

From: Dianne Dugas

Sent: Friday, December 04, 2015 11:06 AM

To: Pettigrew, George (pettigrew.george@epa.gov)

Cc: Raoult Ratard; Kathleen Aubin; Shannon Soileau; Andrews, Patricia (PAndre@lsuhsc.edu); Luann E White

Subject: FW: Cancer

George, attached are documents related to Louisiana TRI, the "Cancer Corridor" and a recent ESJE public health investigation. I hope this information is helpful in relation to results of the current EPA National Air Toxics Assessment. Please let me know if you have any other questions or concerns. Thanks. Dianne

To: Diem, Art[Diem.Art@epa.gov]
From: Strum, Madeleine
Sent: Tue 11/3/2015 12:40:35 PM
Subject: FW: conference call -- 9 central/10 eastern 919 541 4328 and adobe connect link
[Poly Building Fans.xlsx](#)
[EPA Modeling SpreadsheetDuPont.xlsx](#)
[Fan Drawing.pdf](#)
[Release Point Diagram.pdf](#)
[Poly Building Fans.pdf](#)

Hi Art,

Do you think it is worth for each of these equipment types to describe the emission release point(s) --- fug/stack/fan and how many release points for each? I think I sent you the modeling files, but I hadn't sent you these other attachments. The modeling spreadsheet here is before we put in the release points for the fans; it is based on what the state reported to EIS.

From: Diem, Art
Sent: Friday, October 30, 2015 2:58 PM
To: Casso, Ruben <Casso.Ruben@epa.gov>
Cc: Strum, Madeleine <Strum.Madeleine@epa.gov>; Smith, Darcie <Smith.Darcie@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Palma, Ted <Palma.Ted@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>
Subject: RE: FYI - annual DuPont facility-wide chloroprene emissions 1991-2014

Hi All,

I've attempted to categorize the emissions points. See below.

There seems to be a lot of uncontrolled emissions here and potential for emission reductions.

The Dryers and Building Vents may be difficult.

Also, need to be careful about controls using combustion given chlorine on chloroprene.

Thanks,

Art

Equipment type	2013 Chloroprene Emissions (lbs)	2013 Chloroprene Emissions (tons)
<div>Ex. 5 - Deliberative</div>		
Total	250520	125.26

From: Strum, Madeleine
Sent: Wednesday, July 15, 2015 7:38 AM
To: Doris.B.Grego@dupont.com; Thurman, James <Thurman.James@epa.gov>;
Kelly.Petersen@LA.gov; Casso, Ruben <Casso.Ruben@epa.gov>
Subject: conference call -- 9 central/10 eastern 919 541 4328 and adobe connect link

If we need to share our screens to look at any of the files together, I've reserved an adobe connect meeting.

Just click on the link: <https://epa.connectsolutions.com/natamodeling/>

this will open up an application where we can share our screens if we need to.

Talk to you soon,

Madeleine

From: Doris.B.Grego@dupont.com [mailto:Doris.B.Grego@dupont.com]
Sent: Tuesday, July 14, 2015 10:44 AM
To: Strum, Madeleine; Thurman, James; Kelly.Petersen@LA.gov
Subject: Chloroprene Emissions - DuPont

I have converted the attachments I sent previously (Release Point Diagram and Fans location) to pdfs and are attached. I'm also including a Fan Drawing showing three of the Poly Building walls. The fans on the west side are the intake fans, the ones on the east and south walls are the discharge ones. This drawing does not show the fans as they are today, but it might help visualize the building and its venting system.

-----from earlier-----

Attached is the revised EPA Modeling spreadsheet for the chloroprene sources at the DuPont Facility located in LaPlace, Louisiana. The changes are in red.

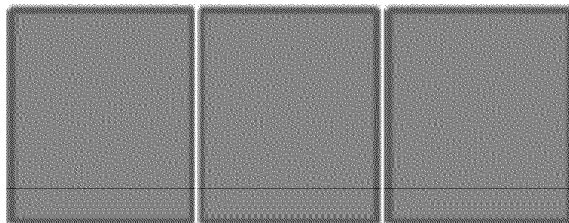
Two items need to be clarified.

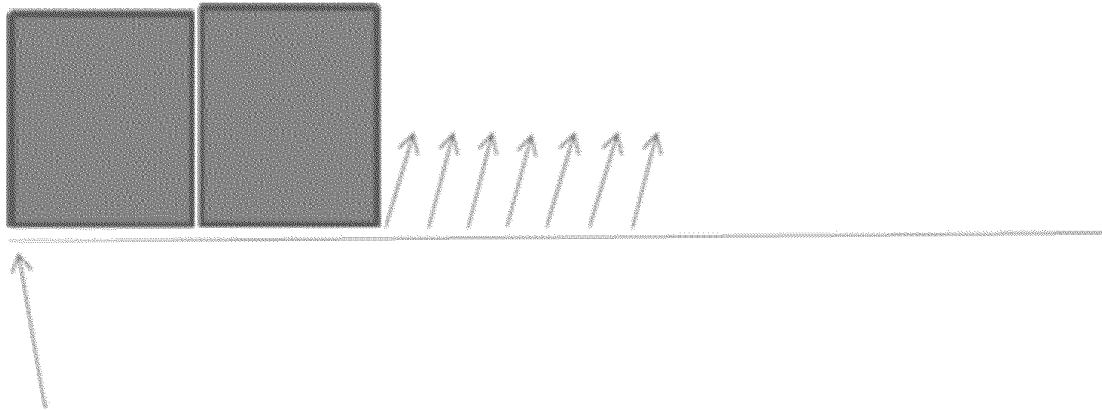
1. On the chloroprene tab of the Modeling spreadsheet, the sources highlighted in pink do not discharge directly to the atmosphere, these sources are routed through on the of the vents listed in rows 1 through 39.

For example sources NEO 222 thru 226 (rows 99 to 103) discharge through vent RPN015 which is source NEOR15 (row 1). Only the sources on rows 1 through 39 should be modeled.

See example below.

NEOR15





RPN015 the
release point

NEO222

NEO224

NEO225

NEO2

2. The second source on the spreadsheet, NEO185, consists of seventeen wall fans located on the Poly Building. Twelve fans are located on the east wall of the building, five are located on the south wall of the building. Attached is an Xcel file which includes two diagrams, one for each wall, and a table with the dimensions, emissions and locations of the fans. The fans are either 8' x 8' or 4' x 4', they are used to pull air from the building to minimize the concentration of chloroprene. For permitting and reporting purposes, I grouped all the fans into one fugitive emission source. For modeling purpose, they should be considered individually.

Doris B. Grego, P.E.

Senior Environmental Consultant

985-536-5437



To: Pagan, Ines[Pagan.Ines@epa.gov]
From: Rimer, Kelly
Sent: Fri 10/16/2015 10:09:54 AM
Subject: Fwd: Follow up on chloroprene modeling and additional questions

Ines,

Here is an email from Patrick Walsh. Let's bring in the IRIS folks on this and make it a priority to follow up with Patrick.

Thanks

Kelly Rimer

Leader, Air Toxics Assessment Group

US EPA

Office of Air Quality Planning and Standards

109 TW Alexander Drive

RTP. NC 27709

Begin forwarded message:

From: <PATRICK.A.WALSH@dupont.com>
Date: October 15, 2015 at 6:27:32 PM EDT
To: <Kelly.Petersen@LA.GOV>, <Doris.B.Grego@dupont.com>, <James.B.Allen@dupont.com>, <Carlos.F.Saldana@dupont.com>, <Palma.Ted@epa.gov>, <Morris.Mark@epa.gov>, <Casso.Ruben@epa.gov>, <Rimer.Kelly@epa.gov>, <Strum.Madclcinc@epa.gov>
Subject: RE: Follow up on chloroprene modeling and additional questions

All,

I have reviewed all the appropriate information and my position hasn't changed. I'm worried that EPA is going down the wrong path. Let me explain my thinking to you:

My problem is that the data as presented by EPA with regard to NATA are presented as "cancer risk":

Facility ID	FIPS	Tribal Code	Parameter	Pollutant	Risk Value (cancer risk reported in a million)	Facility Emissions (tpy)	Facility Name	State	County Name	Comments
8026612	2095	Cancer risk	Chloroprene	1816.044	130.0775	E I DuPont de Nemours & Co - Pontchartrain Site	LA	St. John the Baptist		

(Taken from email from Madeleine Strum to Kelly Petersen, 6/24/15)

That would read to most people that chloroprene is a known, proven human carcinogen. But it hasn't been proven, or even generally accepted, and EPA's own toxicology data states such.

The IRIS database for chloroprene reads similarly to the IARC monograph:

"Under the Guidelines for Carcinogen Risk Assessment (U.S. EPA, 2005), there is evidence that chloroprene is 'likely to be carcinogenic to humans'"

Even the IRIS group will not explicitly state that chloroprene is a KNOWN human carcinogen. The entire series of documents discusses chloroprene's carcinogenicity in mice and rats only. While they can be used as models for human physiology, mice and rats are NOT human, and there are numerous examples of materials that are spectacularly toxic to non-human animals but have little or no effect on humans (chocolate springs to mind). Therefore, it is, in my opinion, an irresponsibly large leap to present the chloroprene release data as definitely carcinogenic to humans by presenting it as "increased cancer risk".

In addition, the epidemiological data does not comport with the model at all. The following table describes actual cancer rates for St. John Parish for the most recent 4-year period for which data is available:

Rank	County	Annual Incidence Rate(†) over period cases per 100,000	Lower 95% Confidence Interval	Upper 95% Confidence Interval	Average Annual Count over rate period	Rate Period	Recent Trend	Recent 5- Year Trend (‡) in Incidence Rates	Lower 95% Confidence Interval	Upper 95% Confidence Interval
53	St. John the Baptist Parish(7,9)	460.8	432.3	490.7	209	2008-2012	stable	-2.2	-9.4	5.6

(Data from

<http://statecancerprofiles.cancer.gov/incidencerates/index.php?stateFIPS=22&cancer=001&race=00&sex=0&age=001>

Given the following:

1. 50+ year history making chloroprene in St. John Parish
2. 20-30 year latency period for most cancers

According to the risk factors EPA attributes to our chloroprene emissions, St. John Parish should have the highest cancer rate in the state. This should be especially true given that our history of emitting chloroprene is much longer than the typical latency for cancer. But in actuality, St. John is in the **lowest quartile** of measured cancer rates in the state (#53 out of 66 parishes) and the rate of cancer is decreasing according to the 5-year trend. Thus, the model has a serious flaw as it doesn't come close to reflecting real, published cancer rate data.

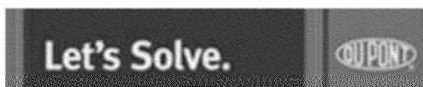
The above, taken together, indicate that EPA is planning to publish misleading data in an inflammatory way. Therefore, it would be irresponsible to publish it. I strongly urge EPA to reconsider its present course.

Patrick A. Walsh, CIH
E.I. DuPont De Nemours and Company
Safety, Health, Environmental, and PSM Manager
DuPont Performance Polymers Pontchartrain Works
LaPlace, LA 70068

(985) 536-5731 Work

Ex. 6 - Personal Privacy

Patrick.A.Walsh@dupont.com



-----Original Appointment-----

From: Kelly Petersen [<mailto:Kelly.Petersen@LA.GOV>]

Sent: Tuesday, October 06, 2015 10:09 AM

To: Kelly Petersen; GREGO, DORIS B; ALLEN, JAMES B; SALDANA, CARLOS F; Palma, Ted; Morris, Mark; Casso, Ruben; 'Rimer, Kelly'; Strum, Madeleine; WALSH, PATRICK A.

Subject: Follow up on chloroprene modeling and additional questions

When: Tuesday, October 06, 2015 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).

Where: `DEQ/Room 919 - OMF Conference

Please join a conference call at 11am central time on Tuesday, October 6th. The call in information is below.

Meeting Number: **Ex. 6 - Personal Privacy**

To join the conference call:

Ex. 6 - Personal Privacy

(2) Enter the Meeting Number, then #

Thanks, Kelly Petersen

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